

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Grand Juror Doe,)	
)	
Plaintiff,)	
)	
v.)	No. 4:15-cv-00006-RWS
)	
Robert P. McCulloch, in his official capacity)	
as Prosecuting Attorney for St. Louis)	
County, Missouri,)	
)	
Defendant.)	

CONSENT MOTION FOR EXTENSION OF TIME TO FILE
MEMORANDUM IN OPPOSITION TO MOTION TO DISMISS

Comes now Plaintiff, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and E.D.Mo. L.R. 1.05, and, with the consent of counsel for Defendant, moves this Court for a two-week extension of time, from February 19, 2015, to March 5, 2015, in which to file a memorandum in opposition to Defendant's motion to dismiss. In support, Plaintiff states:

1. After a two-week extension of time, Defendant filed a motion to dismiss and memorandum in support on February 9, 2015. (Doc. ## 26, 28).
2. Pursuant to E.D.Mo. L.R. 4.01(B) and Fed. R. Civ. P. 6(d), Plaintiff's memorandum in opposition is due on February 19, 2015.
3. The motion to dismiss raises multiple complex and novel legal issues and, because of deadlines and obligations in other matters, counsel for Plaintiff requires additional time to prepare Plaintiff's memorandum in opposition.
4. Plaintiff requests an extension of two weeks, through and including March 5, 2015.
5. Counsel for Defendant consents to this request for a two-week extension.

WHEREFORE Plaintiff requests this Court grant an extension of time through and including March 5, 2015, in which to file a memorandum in opposition to Defendant's motion to dismiss.

Respectfully submitted,

/s/ Anthony E. Rothert

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Attorneys for Plaintiff

Certificate of Service

I certify that on February 12, 2015, a copy of the foregoing was served by operation of the Court's CM/ECF system on counsel for Defendant.

/s/ Anthony E. Rothert